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Chamberlain

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,
Plaintiff,
vs.
MICHAEL RICHARD LYNCH AND
STEPHEN KEITH CHAMBERLAIN,
Defendants.

CASE NO. 3:18-cr-00577-CRB

**STIPULATION AND [PROPOSED]
ORDER CLARIFYING
CONDITIONS OF BOND FOR
DEFENDANT STEPHEN
CHAMBERLAIN**

Assigned to Hon. Charles R. Breyer

17 WHEREAS, on November 13, 2019, Defendant Stephen Chamberlain's Ex
18 Parte Application to Clarify Conditions of Bond came on for hearing. At the
19 hearing, the Court stated that it was willing to modify the bond language and
20 requested that the parties submit a stipulation with language that would address the
21 respective parties' interests;

WHEREAS, this is a complex proceeding which is likely to have a lengthy post-indictment time period;

WHEREAS, in addition to assisting with his defense and honoring his responsibilities to the Court, Mr. Chamberlain has an interest in maintaining gainful employment and honorably performing his work duties. This includes being able to attend work meetings and work productively while he is in the United States;

28 WHEREAS, the United States has an interest in minimizing its oversight

burdens while Mr. Chamberlain is in the United States;

THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE:

When Mr. Chamberlain seeks to travel to the United States for Court and/or for legal defense preparation work, the United States will make good-faith efforts to assist in obtaining permission for him to do so; and

Nothing in the bond order limits Mr. Chamberlain's ability to engage in non-legal work, including to attend work-related meetings, so long as (i) travel to locations outside of California is disclosed to the United States in advance of travel, and (ii) if the United States objects in writing to counsel for Mr. Chamberlain that such travel would involve an undue burden on the United States, such travel to other states will not be permitted without prior Court approval.

IT IS SO STIPULATED.

DATED: December 11, 2019 BIRD, MARELLA, BOXER, WOLPERT,
NESSIM, DROOKS, LINCENBERG &
RHOW, P.C.

By: /s/ *Gary S. Lincenberg*

Gary S. Lincenberg

Attnorneys for Defendant Stephen Keith
Chamberlain

DATED: December 11, 2019

DAVID L. ANDERSON
United States Attorney

By: /s/ *Robert S. Leach*

Robert S. Leach,

Assistant United States Attorney
Attorneys for United States of America

IT IS SO ORDERED.

DATED:

THE HONORABLE CHARLES R. BREYER
United States District Judge